

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Alkis Nakos

No: 1:14-cr-93-LM

DEFENDANT ALKIS NAKOS'S MOTION TO RECONSIDER

NOW COMES Defendant Alkis Nakos, by and through his counsel, Robert S. Carey, Orr & Reno, P.A., and moves this Court to reconsider its denial of motion to re-open his detention hearing for the following reasons:

1. In its written decision denying Nakos's motion to re-open detention hearing, the Court incorporated its reasons stated at the June 30 detention hearing. Of note, the Court cited evidence attacking the legitimacy of [Alkis Nakos's] business and gambling activity of at least \$550,000.
2. Thus far, the prosecution has produced no analysis of the sales of Amory Street Pizza, where Nakos worked.
3. Similarly, the prosecution has produced no analysis of Nakos's gambling activity.
4. Nakos's motion to re-open detention hearing focused on his daughter's birth and his employment if released. Because the Court has cited the business and gambling reasons in its denial of the motion re-open, Nakos submits that the lack of

discovery concerning Nakos's business and gambling is a manifest error of fact that warrants reconsideration under L.R. 7.2(d).

7. The Government, through AUSA Terry Ollila, objected to the motion to re-open detention hearing. At this writing, counsel was unable to obtain the Government's position on this motion to reconsider. Presumably, the previous objection stands.

WHEREFORE, Mr. Nakos respectfully requests this Court:

- A. Grant this Motion to Reconsider;
- B. To release him on personal recognizance bail, with conditions the Court deems appropriate; and
- C Grant such other relief the Court deems necessary and just.

Respectfully submitted,

ALKIS NAKOS

By his Attorney,

Dated: December 19, 2014

/s/ Robert S. Carey
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CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2014, a copy of the within Notice was Electronically Served upon all counsel of record and Conventionally upon Alkis Nakos.

/s/ Robert S. Carey
Robert S. Carey, NH Bar #11815

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